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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**BRAND LITTLE and ROBIN BURNS,**  
 Individually and on Behalf of All Others Similarly  
 Situated,

Plaintiffs,  
 v.

**PACIFIC SEAFOOD PROCUREMENT, LLC;  
 PACIFIC SEAFOOD PROCESSING, LLC;  
 PACIFIC SEAFOOD FLEET, LLC; PACIFIC  
 SEAFOOD DISTRIBUTION, LLC; PACIFIC  
 SEAFOOD USA, LLC; DULCICH, INC.;  
 PACIFIC SEAFOOD – EUREKA, LLC;  
 PACIFIC SEAFOOD – CHARLESTON, LLC;  
 PACIFIC SEAFOOD – WARRENTON, LLC;  
 PACIFIC SEAFOOD – NEWPORT, LLC;  
 PACIFIC SEAFOOD – BROOKINGS, LLC;  
 PACIFIC SEAFOOD – WESTPORT, LLC;  
 PACIFIC SURIMI – NEWPORT LLC; BLUE  
 RIVER SEAFOOD, INC.; SAFE COAST  
 SEAFOODS, LLC; SAFE COAST SEAFOODS  
 WASHINGTON, LLC; OCEAN GOLD  
 SEAFOODS, INC.; NOR-CAL SEAFOOD,  
 INC.; KEVIN LEE; AMERICAN SEAFOOD  
 EXP, INC.; CALIFORNIA SHELLFISH  
 COMPANY, INC.; ROBERT BUGATTO  
 ENTERPRISES, INC.; ALASKA ICE  
 SEAFOODS, INC.; LONG FISHERIES, INC.;  
 CAITO FISHERIES, INC.; CAITO  
 FISHERIES, LLC; SOUTHWIND FOODS,  
 LLC; FISHERMEN’S CATCH, INC.;  
 GLOBAL QUALITY FOODS, INC.; GLOBAL  
 QUALITY SEAFOOD LLC; OCEAN KING**

Case No. 3:23-cv-01098-AGT

**STIPULATION BETWEEN  
 PLAINTIFFS AND DEFENDANT  
 GLOBAL QUALITY FOODS,  
 INC. REGARDING DEADLINE  
 TO JOIN PARTIES OR AMEND  
 PLEADINGS; ~~[PROPOSED]~~  
 ORDER**

Judge: Honorable Alex G. Tse

STIPULATION BETWEEN PLAINTIFFS AND DEFENDANT GLOBAL QUALITY FOODS, INC. REGARDING  
 DEADLINE TO JOIN PARTIES OR AMEND PLEADINGS; [PROPOSED] ORDER; Case No. 3:23-cv-01098-AGT

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**FISH INC.; BORNSTEIN SEAFOODS, INC.;  
ASTORIA PACIFIC SEAFOODS, LLC; and  
DOES 29-60,**

Defendants.

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1 Plaintiffs Brand Little and Robin Burns (collectively, "Plaintiffs") and Defendant Global  
2 Quality Foods, Inc. ("GQF"), by and through their counsel of record, hereby stipulate as follows:

3 WHEREAS, on March 4, 2025, the Court entered a Case Management Order which set  
4 the last day to move to join parties or amend pleadings as January 12, 2026 (Dkt. No. 282);

5 WHEREAS, on December 2, 2025, Plaintiffs served on GQF Requests for Production of  
6 Documents, Interrogatories, and Requests for Admission that seek documents and information  
7 that could bear on Plaintiffs' decision to add claims against GQF and/or add, as defendants,  
8 GQF's principals ("Plaintiffs' GQF discovery requests");

9 WHEREAS, GQF has requested an extension of time to respond to Plaintiffs' discovery  
10 requests, and Plaintiffs and GQF have agreed to extend the deadline to respond to January 30,  
11 2026, provided that GQF agrees not to oppose a motion to add claims against GQF and/or its  
12 principals on timeliness grounds if it is brought after January 12, 2026;

13 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS,  
14 SUBJECT TO THE COURT'S APPROVAL:

- 15 1) With respect to any additional claims against GQF and/or its principals, the January  
16 12, 2026 deadline for Plaintiffs to move to join parties or amend pleadings shall not  
17 apply to any additional claims against GQF and/or its principals, such deadline being  
18 adjourned to March 15, 2026; and
- 19 2) GQF's response to Plaintiffs' December 2, 2025 discovery requests shall be due on  
20 January 30, 2026.

21  
22 The undersigned confirm that they have authorized the filer of this stipulation to sign it on  
23 their behalf.

24 Respectfully submitted,

25  
26 Dated: January 7, 2026

/s/ Stuart G. Gross

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Travis H. A. Smith (SBN 331305)

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*Counsel for Plaintiffs and the Proposed Class*

DATED: January 7, 2026

/s/ Ann A.P. Nguyen  
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*Attorneys for Defendant Global Quality Foods, Inc.*

**~~PROPOSED~~ ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: January 8, 2026



Hon. Alex G. Tse  
United States Magistrate Judge

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